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November 14, 2000

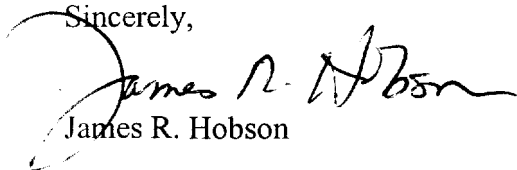
Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: King County (WA) Petition, DA 00-1875, CC Docket 94-102

Dear Ms. Salas:

Submitted herewith, pursuant to Section 1.1206 of the Rules, are an original and one copy of a handout discussed at a meeting today with members of the staff of the Commission's Wireless Telecommunications Bureau Policy Division. Attending were Norm Forshee, Jim Goerke, Mark Adams, Elizabeth McGlynn and the undersigned for the National Emergency Number Association ("NENA") and Bob Gurss for the Association of Public-Safety Communications Officials-International, Inc. ("APCO").

Sincerely,


James R. Hobson

cc: Kris Monteith, FCC/WTB/Policy Division

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**DEMARCATATION AT THE SELECTIVE ROUTER
Summary Views of NENA, APCO and NASNA**

1. The FCC's wireless E9-1-1 rule requires that PSAPs be capable of receiving and utilizing the data elements of Automatic Number Identification (ANI) and automatic location information (ALI) before a wireless carrier is obliged to deliver ANI and ALI.

2. But the phrase "receiving and utilizing" does not specify where the wireless carrier is to deliver the data elements and where the PSAP is to receive them. Ultimately, the data is "utilized" at the PSAP itself.

3. Most wireless carriers argue that they need only provide the data elements on the trunk side of their Mobile Switching Centers (MSCs). It is the PSAP's responsibility, say the carriers, to pay for connecting the MSC to the Selective Router (9-1-1 tandem) switch that will then forward the data elements, directly or indirectly, to the PSAP.

4. SBC Wireless and Nextel disagree. As SBC puts it, wireless carriers or their agents should be

responsible for the voice interconnection between their Mobile Switching Center ("MSC") and the LEC 911 Selective Router as well as data connections for carrying location and number data information to the ALI database or the interconnection point to the ALI database. (Comments, 2)

5. King County, NENA, APCO and NASNA agree with SBC and Nextel.

6. When the majority carriers expected to be reimbursed for their costs, they readily identified the MSC-Selective Router connection as their responsibility. Since the revised cost recovery order of 11/99, they have reversed that position without a good explanation.
7. Wireless carriers pay for commercial connection to the PSTN; they also should pay for 9-1-1 connection to the Selective Router.
8. The analogy to PSAP payment for connection to wireline end offices is not controlling or persuasive.
9. If the majority carrier view is accepted, the November 1999 order will have been nullified.
10. In the end, any 9-1-1 Authority and any wireless carrier remain free, under that order, to negotiate a different allocation of financial responsibility. Demarcation at the Selective Router need only apply in the absence of some other agreement.

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